## *Remarks*

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-24 are pending in the application, with claim 1 being the independent claim. Claim 1 is sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

### *Rejections under 35 U.S.C. § 102*

The Examiner has rejected claims 1, 3-11, and 16-24 under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,173,266 to Marx et al. ("Marx"). For the reasons set forth below, Applicants submit that Marx does not disclose each and every element and/or feature of Applicants' claims, and thus does not anticipate claims 1, 3-11, and 16-24. Accordingly, Applicants respectfully traverse.

First, Applicants seek to amend independent claim 1. Although Applicants respectfully disagree with the Examiner's rejection, the Examiner's rejection of claim 1 is moot in light of the current Amendment.

Claim 1 as amended is directed to a method including the steps of:

> utilizing at least one generic software component to develop a specific voice application, including invoking in a development environment at least one generic dialog asset from a repository;

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deploying the specific voice application in a deployment environment separate from the development environment, wherein the deployment environment includes an instance of the repository; and

invoking in the deployment environment the at least one generic dialog asset from the repository.

The amendment finds support in the specification, *inter alia*, at paragraph [0016] ("... wherein the deployment environment includes the repository."), FIG. 5, and paragraph [0069] ("the voice application repository 600 provides a consistent storage location for dialog assets that can be managed by the voice application developer during the dialog design phase 1102, and that can be deployed to multiple platforms quickly and easily.)

Marx nowhere teaches or suggests invoking in a development environment at least one generic dialog asset from a repository while furthermore invoking in a deployment environment the at least one generic dialog asset from that repository. Marx discloses the use of dialogue module templates which can be configured to provide appropriate dialogue module instances for use in a service. *See* Marx, col. 17, ll. 7-10. The dialogue module templates themselves are only available during development of a service in Marx. For example, Marx discloses a graphical user interface ("GUI") in a development environment for creating a service in which icons representing dialogue module templates are dragged onto a workspace to create an instance of the dialogue modules. *See* Marx, col. 16, ll. 32-38.

Accordingly, if claim 1 is given the Examiner's proposed interpretation, the "generic dialog assets" would correspond to one of the dialogue module templates in Marx, and the "repository" would correspond to the baseline library, as indicated by the Examiner on page 4 of the Office Action. If this interpretation is used, then it cannot be

said that Marx teaches "invoking in the deployment environment the at least one generic dialog asset from the repository" as recited in claim 1. This is because the baseline library in Marx is never utilized by a deployed application, nor are the dialogue module templates.

Marx specifically discloses that a baseline library is used to provide "default settings, including standard default parameters, prompt files, recognized vocabularies, header functions, and templates for the various dialogue tasks performed by the dialogue modules." *See* Marx, col. 17, ll. 9-14. However, the library is used to define the behavior of a dialogue module instance, in conjunction with any further customization provided by a developer through the use of a system library. *See* Marx, col. 17, ll. 7-9 and 14-18. As previously noted, instances are created during development in Marx. *See* Marx, col. 16, ll. 32-38. In fact, the only customization of an instance that can be done on a deployed service in Marx is customization of the instance itself, with no mention of any use of the template. *See* Marx, col. 17, ll. 43-54.

With respect to the Examiner's arguments on Page 3 of the Office Action, Applicants respectfully disagree that FIG. 8 shows a deployment environment wherein at least one generic dialog asset is invoked from a repository. Marx states that FIG. 8 is used to illustrate "the relationship between a Service 410 and the Dialogue Modules 430" from FIG. 4. *See* Marx, col. 17, ll. 2-5. This relationship implies nothing about the existence of the dialogue module templates 810 during the deployment of service 840. Applicants respectfully submit that service 840 only has access to the particular dialogue module instances 850 during deployment of the service. Accordingly, it cannot be said that Marx teaches or suggests the invoking of at least one generic dialog asset from a

repository in a deployment environment, wherein the repository corresponds to the repository available in a development environment.

Since Marx does not teach or suggest each and every feature of independent claim 1, Marx cannot anticipate that claim. Applicants submit that dependent claims 3-11 and 16-24 are also not anticipated by Marx for at least the same reasons as independent claim 1 from which they depend, and further in view of their own respective features. Accordingly, the Examiner's rejection of claims 1, 3-11, and 16-24 under 35 U.S.C. § 102(e) is traversed and Applicants respectfully request that the rejection be withdrawn.

### Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 2 and 12-15 under 35 U.S.C. § 103(a) as being allegedly obvious over Marx in view of U.S. Patent No. 5,915,001 to Uppaluru ("Uppaluru"). Claims 2 and 12-15 depend from independent claim 1 and therefore incorporate the features recited in claim 1. As noted above, Marx does not teach or suggest all the features of claim 1. Uppaluru does not overcome the deficiencies of Marx with respect to claim 1. For at least this reason, dependent claims 2 and 12-15 are not obvious from the combination of Marx and Uppaluru. Accordingly, the Examiner's rejection of claims 2 and 12-15 under 35 U.S.C. § 103(a) is traversed, and Applicants respectfully request that the rejection be withdrawn.
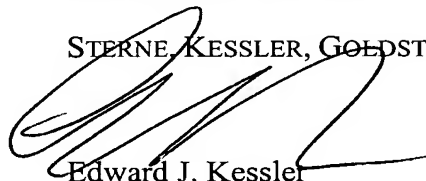
## *Conclusion*

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot.  Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn.  Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.  If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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